

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ZUMA PRESS, INC., ACTION SPORTS  
PHOTOGRAPHY, INC., TIYU (BEIJING)  
CULTURE MEDIA CO. LTD., MANNY  
FLORES, ANDREW DIEB, CHRISTOPHER  
SZAGOLA, LOUIS LOPEZ, CHARLES BAUS,  
DUNCAN WILLIAMS, ROBERT BACKMAN,  
JOHN MIDDLEBROOK, and ANTHONY  
BARHAM,

Plaintiffs,

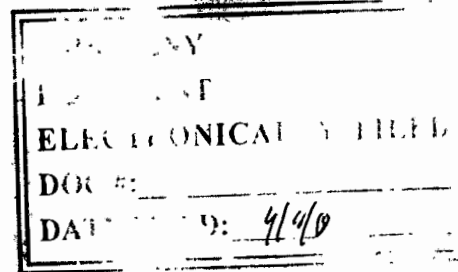
v.

GETTY IMAGES (US), INC.

Defendant.

Case No.: 1:16-cv-06110 (AKH)

**NOTICE OF DEFENDANT'S  
MOTION FOR LEAVE TO FILE  
EXHIBIT UNDER SEAL**



**PLEASE TAKE NOTICE** that pursuant to Section 4.B.1 of the Court's Individual Rules, and upon the accompanying Memorandum and the Declaration of Benjamin E. Marks, both dated February 20, 2018, Defendant Getty Images (US), Inc. ("Getty Images") will move this Court before the Honorable Alvin K. Hellerstein, United States District Judge, United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, on such date as the Court may set, for an Order permitting Getty Images to file under seal an unredacted copy of Exhibit Q to the Declaration of Jonathan Bloom, dated February 20, 2018, on the ground that it contains non-public competitively sensitive information.

*Motion Denied. Defendant has not shown which terms are commercially sensitive, and why they are so, to overcome the presumption of public access to judicial documents. See Lugosch v. Pyramid Co. of Onondaga, 435 F.3d 110, 124 (2d Cir. 2006).*

4-11-18

*Alvin K. Hellerstein*

Dated: New York, New York  
February 20, 2018

Respectfully submitted,

By: /s/ Benjamin E. Marks  
Benjamin E. Marks  
Jonathan Bloom

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(US), Inc.*